

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Plaintiff

vs.

NAVY CONTRACTORS, INC

Defendant

CIVIL NO.

COMPLAINT

The United States of America, on behalf of its Agency, the Department of Treasury, by its specially appointed counsel KML Law Group, P.C., represents as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. 1345.
2. The last-known address of the Defendant, NAVY CONTRACTORS, INC is 11 Bernice Road, North Arlington, NJ 07031.
3. Defendant owes Plaintiff the principal sum of \$63,412.00, plus interest of \$2,301.36, plus penalty fee of \$13,491.12, plus Admin fee of \$20.00, plus DMS fees of \$25,351.83, plus DOJ fees of \$3,234.32 for a total of \$107,810.63. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit "A" ("Certificate of Indebtedness").
3. Defendant owes Plaintiff the principal sum of \$11,382.00, plus interest of \$373.79, plus penalty fee of \$2,185.81, plus Admin fee of \$20.00, plus DMS fees of

\$4,467.71, plus DOJ fees of \$569.98 for a total of \$18,999.29. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “B” (“Certificate of Indebtedness”).

3. Defendant owes Plaintiff the principal sum of \$37,601.00, plus interest of \$1,157.99, plus penalty fee of \$6,759.94, plus Admin fee of \$20.00, plus DMS fees of \$14,572.46, plus DOJ fees of \$1,859.12 for a total of \$61,970.51. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “C” (“Certificate of Indebtedness”).

3. Defendant owes Plaintiff the principal sum of \$8,536.00, plus interest of \$280.32, plus penalty fee of \$1,639.26, plus Admin fee of \$20.00, plus DMS fees of \$3,352.19, plus DOJ fees of \$427.66 for a total of \$14,255.43. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “D” (“Certificate of Indebtedness”).

3. Defendant owes Plaintiff the principal sum of \$207,116.00, plus interest of \$5,919.83, plus penalty fee of \$34,483.40, plus Admin fee of \$20.00, plus DMS fees of \$79,212.55, plus DOJ fees of \$10,105.73 for a total of \$336,857.51. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “E” (“Certificate of Indebtedness”).

3. Defendant owes Plaintiff the principal sum of \$210,033.00, plus interest of \$6,003.20, plus penalty fee of \$34,969.06, plus Admin fee of \$20.00, plus DMS fees of \$80,328.08, plus DOJ fees of \$10,248.04 for a total of \$341,601.38. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “F” (“Certificate of Indebtedness”).

3. Defendant owes Plaintiff the principal sum of \$36,883.00, plus interest of 947.09, plus penalty fee of \$5,498.09, plus Admin fee of \$20.00, plus DMS fees of

\$13,871.42, plus DOJ fees of \$1,769.68 for a total of \$58,989.28. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “G” (“Certificate of Indebtedness”).

4. Demand has been made upon Defendant by Plaintiff for the sum due but the amount due remains unpaid.

WHEREFORE, the plaintiff demands judgment against Defendant as follows;

(A) In the amount of \$940,484.03 with interest from March 28, 2022.

(B) Interest to accrue at the rate of 6% to the date of judgment.

(C) Interest from the date of judgment at the legal rate of interest in effect on the date of judgment until paid in full.

(D) Costs of suit.

Notice is hereby given to Defendant that Plaintiff intends to seek satisfaction of any judgment rendered in its favor in this action from any debt accruing.

United States of America by and through
Its specially assigned counsel
KML Law Group, P.C.

/s/Rebecca A. Solarz, Esq.
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EXHIBITS

“A” CERTIFICATE OF INDEBTEDNESS
“B” CERTIFICATE OF INDEBTEDNESS
“C” CERTIFICATE OF INDEBTEDNESS
“D” CERTIFICATE OF INDEBTEDNESS
“E” CERTIFICATE OF INDEBTEDNESS
“F” CERTIFICATE OF INDEBTEDNESS
“G” CERTIFICATE OF INDEBTEDNESS